

HEATHER E. WILLIAMS, #122664
Federal Defender
MEGAN T. HOPKINS, #294141
Assistant Federal Defender
801 I Street, 3rd Floor
Sacramento, CA 95814
Tel: 916-498-5700/Fax: 916-498-5710

Attorney for Defendant
JOEY DONALD STEWART CAMPBELL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:21-cr-206-DAD
)	
Plaintiff,)	STIPULATION FOR MODIFICATION OF
)	CONDITIONS OF PRETRIAL RELEASE;
vs.)	ORDER
)	
JOEY DONALD STEWART)	Hon. Deborah Barnes
CAMPBELL,)	
)	
Defendant.)	

The defendant, JOEY DONALD STEWART CAMPBELL, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Roger Yang, hereby stipulate to and request an order from this Court modifying the conditions of Mr. Campbell's pretrial release to replace the condition of location monitoring: home detention with **location monitoring: curfew**. Mr. Campbell's assigned pretrial services officer approves of this stipulated modification and has communicated the approval and proposed modified condition to the parties. The proposed amended conditions of release are submitted with this stipulation as Exhibit A.

Mr. Campbell has been on pretrial release in this district since October 2021, on a \$100,000 secured appearance bond. *See* Dkt. 12. Mr. Campbell is in compliance with all of his conditions of release. One of those conditions of release is location monitoring. Mr. Campbell is currently subject to home detention, and therefore must remain inside his residence except for pre-approved employment; education; religious services; medical, substance abuse, or mental

1 health treatment; attorney visits; court appearances; court ordered obligations; or other activities
2 authorized by the pretrial services officer. In light of Mr. Campbell's lengthy history of
3 compliance with all of his conditions and the reduced assessment of flight risk and/or danger in
4 this case, the parties request that the location monitoring condition be modified to a curfew from
5 5:00 p.m. to 8:00 a.m., daily. The parties do not request a hearing in this matter in light of this
6 stipulation.

7
8 DATED: December 6, 2022 Respectfully submitted,
9 HEATHER E. WILLIAMS
Federal Defender

10 /s/ Megan T. Hopkins
11 MEGAN T. HOPKINS
12 Assistant Federal Defender
Attorney for JOEY DONALD STEWART CAMPBELL

13
14 DATED: December 6, 2022 PHILLIP A. TALBERT
15 United States Attorney

16 /s/ Roger Yang
17 ROGER YANG
18 Assistant United States Attorney
Attorney for the United States

ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Amended Special Conditions of Release for defendant, Joey Donald Stewart Campbell, are hereby **ADOPTED**. Mr. Campbell shall be subject to a **curfew from 5:00 PM to 8:00 AM, daily**. All other conditions of pretrial release shall remain in force.

Dated: December 7, 2022



DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE